

REMARKS

This Amendment is filed in response to the Office Action dated January 11, 2005. Accompanying this Amendment is a Petition for Extension of Time under 37 CFR 1.136(a) with the requisite fees, extending the period for response by three months, to July 11, 2005. Upon entry of this Amendment, claims 1 – 24 are pending in this application.

Independent claim 1 has been amended to more clearly point out and distinctively claim features of the present invention. Specifically, claim 1 is amended to recite that the internal polarizer is situated between an electrode and a front or rear surface of a substrate. Support for this amendment is found in the specification and figures, for example at page 6, lines 16 to 22 and in Figures 3 to 7. Applicant respectfully submits that no new matter is added by this Amendment.

New claim 24 is added to recite the direct relationship between the internal polarizer and the electrode. Support for this amendment is found in the specification and figures, for example Figure 3. Applicant respectfully submits that no new matter is added by this Amendment.

The Examiner rejects Claims 1-23 under 35 U.S.C. §103(a) as allegedly unpatentable over Verrall et al. (USP 6,099,758), in view of Mortazavi et al. (USP 5,667,718) and further in view of Trapani et al. (US Pub. No. 2003/0002154). Applicant respectfully traverse this rejection and submit that the claims are patentable over the cited references.

To establish a prima facie case of obviousness under 35 U.S.C. §103(a), three criteria must be met. First, there must be some suggestion or motivation, either in the cited references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify or combine the cited reference relied upon by the Examiner to arrive at the claimed invention. Second, there must be a reasonable expectation that the suggested modification or combination would be successful. Finally, the prior art reference (or references when combined) must teach or suggest each and every limitation of the rejected claims. The teaching or suggestion to make the claimed modification or combination and the reasonable expectation of success must both be found in the prior art, and not based upon in the applicant's disclosure. M.P.E.P. §706.02.

Verrall et al. is directed to a broadband reflective polarizer. Verrall et al. describes a reflective polarizer comprising a layer of a polymerized mesogenic material exhibiting a helically twisted molecular structure with planar alignment. In Figure 1, Verrall et al. shows a display device with this polarizer. Applicant respectfully disagrees with the Examiner's description of the elements shown in Figure 1 of Verrall et al.. As recited at col. 10 lines 50 – 57 of Verrall et al., Figure 1 shows a display device 10 having a liquid crystal cell 18 (not a front panel as stated in the Office action), and a QWF 15 (not a rear panel as stated in the Office Action). Reference number 16 is a compensation film comprised of a layer of homeotropically aligned polymerized liquid crystalline material, and reference number 17 is a linear polarizer.

The Examiner admits that Verrall et al. fails to teach an internal polarizer between an electrode. Indeed, Verrall et al. fails to teach or suggest an electrode or a substrate at all, much less a front and rear panel comprising an internal polarizer situated between an electrode and a front or rear surface of a substrate as recited in Applicant's claims.

The Examiner cites Trapani et al. at page 1, ¶0002 as disclosing polarizers for use in LCDs situated above an electrode Applicant respectfully disagrees. At page 1, ¶0002, Trapani et al. states that "A typical liquid crystal display includes a liquid crystal display cell and an electrode matrix disposed between a pair of absorbing polarizers." This is a general statement, nothing more, and is consistent with conventional polarizers described in the Background section of the subject application where polarizers are used as external polarizers. Trapani et al. does not teach or suggest an internal polarizer. Trapani et al. does not teach or suggest a structure having an electrode and a substrate with a polarizer situated between the electrode and a front or rear surface of a substrate as recited in Applicant's claims.

Applicant does not see the motivation to combine Verrall et al. and Trapani et al. Verrall et al. teaches a very specific material for use as a broadband reflective polarizer. Trapani et al. teaches a particular optical stack. It is not at all obvious that combining these features would result in an operable display device or that the recited purposes of the products would be achieved by such combination. Optics and display technology are complicated and require significant study and experimentation to produce a functioning device. Even if one were to combine the teachings of Verrall et al. and Trapani et al. as the Examiner suggests, one would not arrive at the present invention.

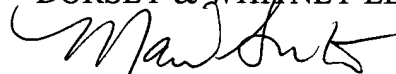
Applicant respectfully submits that Mortazavi et al. adds nothing more. As discussed above the teaching Verrall et al. and Trapani et al., either alone or in combination, do not teach or suggest Applicant's claims. Mortazavi et al. is directed to organic high extinction polarizers based on blends of certain liquid crystalline polymers and suitable dichroic dyes. Mortazavi et al. does not teach or describe a display device, it's teaching is limited to a polarizer film. Thus, Mortazavi et al. cannot teach or suggest a display device with an internal polarizer as recited in Applicant's claims. Furthermore, if one were to combine Verrall et al., Trapani et al. and Mortazavi et al., one would not arrive at Applicant's claimed invention.

Based on the above, Applicant respectfully submits that the cited references fail to establish a case of prima facie obviousness. The cited references, either alone or in combination, do not teach or reasonably suggest each and every limitation of Applicant's claims. Applicant respectfully submits that the application is in condition for allowance.

If any matters can be resolved by telephone, the Examiner is invited to call the undersigned attorney at the telephone number listed below. No fees beyond those being submitted concurrently herewith are believed due. The Commissioner is authorized to charge any additional fees to Deposit Account No. 50, 2319 (Order No. A-72209/MSS/TJH(463031-106)).

Respectfully submitted,

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